

June 24, 2004

William Claude White
Manager, Product Safety
Lyondell Chemical Company
One Houston Center
Suite 1600
Houston, TX 77010

Dear Mr. White:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for 2-Methyl-1,3-Propanediol posted on the ChemRTK HPV Challenge Program Web site on January 27, 2004. I commend Lyondell Chemical Company for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA will post this letter and the enclosed comments on the HPV Challenge Web site within the next few days. As noted in the comments, we ask that Lyondell Chemical Company advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director
Risk Assessment Division

Enclosure

cc: W. Penberthy
M. E. Weber

**EPA Comments on Chemical RTK HPV Challenge Submission:
2-Methyl-1,3-Propanediol**

SUMMARY OF EPA COMMENTS

The sponsor, Lyondell Chemical Company, submitted a test plan and robust summaries to EPA for 2-methyl-1,3-propanediol (CAS No. 2163-42-0) dated December 16, 2003. EPA posted the submission on the ChemRTK HPV Challenge Web site on January 27, 2004.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties. The data provided by the submitter for these endpoints are adequate for the purposes of the HPV Challenge Program.
2. Environmental Fate. The data provided by the submitter for these endpoints are adequate for the purposes of the HPV Challenge Program. Minor revisions are needed for hydrolysis and biodegradation.
3. Health Effects. The data provided by the submitter are adequate for the purposes of the HPV Challenge Program.
4. Ecological Effects. The data provided by the submitter are adequate for the purposes of the HPV Challenge Program. The robust summaries need additional details.

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.

EPA COMMENTS ON 2-METHYL-1,3-PROPANEDIOL CHALLENGE SUBMISSION

Test Plan

Physicochemical Properties (melting point, boiling point, vapor pressure, partition coefficient and water solubility)

The data provided by the submitter for these endpoints are adequate for the purposes of the HPV Challenge Program.

Environmental Fate (photodegradation, stability in water, biodegradation, fugacity)

Available data for these endpoints are adequate for the purposes of the HPV Challenge Program.

Stability in water. Even though this chemical contains no groups susceptible to hydrolysis, the submitter needs to incorporate this information in the robust summary section pertaining to stability in water.

Biodegradation. In the test plan, the submitter needs to indicate that this chemical is not readily biodegradable, as correctly stated in the robust summary, and delete the statement that indicates that this chemical is inherently biodegradable, as this chemical was not tested in an OECD inherent test.

Health Effects (acute toxicity, repeated-dose toxicity, genetic toxicity, and reproductive/developmental toxicity)

Adequate data were submitted for these endpoints for the purposes of the HPV Challenge Program.

Ecological Effects (fish, invertebrates, and algae)

Adequate data were submitted for satisfying the endpoints for acute toxicity to fish, invertebrates and algae.

Specific Comments on the Robust Summaries

Ecological Effects

Fish and Invertebrates. The acute fish and daphnid study summaries did not provide water hardness values. The submitter needs to provide this information.

Followup Activity

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.